

971 Teknor Apex Company



TEKNOR APEX COMPANY

PAWTUCKET, RHODE ISLAND 02862

OUR 82ND YEAR

May 30, 1986

RECEIVED
JUN - 2 1986
REGION I
OFFICE OF REGIONAL COUNSEL

E. Michael Thomas, Esq.
EPA Office of Regional Counsel
JFK Building, Room 2203
Boston, Massachusetts 02203

Re: Cannons Engineering Sites Clean-Up

Dear Mr. Thomas:

Enclosed is an Affidavit attesting to the non-involvement of Teknor Apex Company with the above subject sites.

At the meeting of May 1, 1986 in Boston between the EPA and potentially responsible parties, the EPA suggested that corporations submit such an affidavit with a request for any further information the EPA might have regarding their involvement with the case. If the EPA is in possession of any information which would assist us in determining the nature of any possible link between Teknor and the above sites, please let us know.

Should the information available to the EPA indicate that, as we believe, Teknor Apex was not directly or indirectly involved with the Cannons Engineering Sites, we hereby request that Teknor Apex be provisionally discharged from potential clean-up liability.

If you have any further questions, please let us know.

Very truly yours,

TEKNOR APEX COMPANY

Philip L. Eiker

PLE:ac
Encl.



SEMS DocID 640526

AFFIDAVIT

RE: The Cannons Engineering Corporation site in Bridgewater, Mass;
the Cannons Engineering Corporation site in Plymouth, Mass.; and the
Tinkham Garage site in Londonderry, N.H., hereinafter collectively called
the "Sites".

STATE OF RHODE ISLAND)

) SS.:

COUNTY OF PROVIDENCE)

Paul M. Dubanowitz, being duly sworn, says:

1. Teknor Apex Company is one of the companies named by the United States Environmental Protection Agency, the Department of Environmental Quality Engineering for the Commonwealth of Massachusetts, and the Environmental Protection Bureau of the State of New Hampshire (hereinafter collectively called the "Department") of having potential liability with respect to the above-referenced Site. The purpose of this affidavit is to advise the Department of the non-involvement of Teknor Apex or any of its agents, employees or contractors with the Site, or any single location comprising part of the Site.

2. I have been advised that, the Department alleges that Teknor Apex is potentially liable for a portion of the clean-up of the Site and other responsive measures. The Department has advised that, based upon current information available to it, Teknor Apex remains as one of 96 or more companies in the 2% or less cumulative percent generators at the Cannons Site.

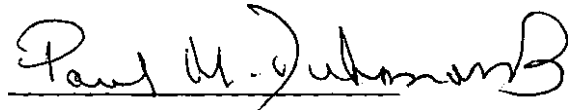
3. Teknor Apex is a Delaware Corporation which maintains its principal place of business in Pawtucket, Rhode Island.

Since 1972, Teknor Apex has contracted exclusively with one waste disposal contractor, whose name does not appear on the list of potentially liable companies. This contractor has represented to us, - and continues to assert - that they, or any firms with which they have subcontracted, have during the period 1972 to present, used only EPA and state approved landfills in Rhode Island and Massachusetts. Upon our own information we have no evidence which would indicate that our waste contractor, or any of its agents or subcontractors, have used other than approved sites for disposal of Teknor Apex waste materials. They have further represented that at no time have they or their agents or subcontractors had dealings with Cannons Engineering Corporation or the Liquidator Corporation in connection with the disposal of waste of any of their customers including Teknor Apex.

4. For its own part, Teknor Apex has made a full internal investigation of its records and personnel to determine whether, during

the period in question, there is any evidence or knowledge of disposal of waste materials at any of the Sites, or business relationship of any kind with either Cannons Engineering Corporation or the Liquidator Corporation. Based upon discussions with current and former plant managers, warehouse managers and other staff, together with a complete review of all internal records relating to waste disposal, Teknor Apex can affirmatively state that there is no internal evidence of any connection with the Sites, either direct, or indirect through Teknor Apex disposal contractors or subcontractors.

5. Accordingly, it is respectfully requested that the Department remove Teknor Apex from the list of potentially responsible parties in connection with the Cannons Engineering Corporation Sites.

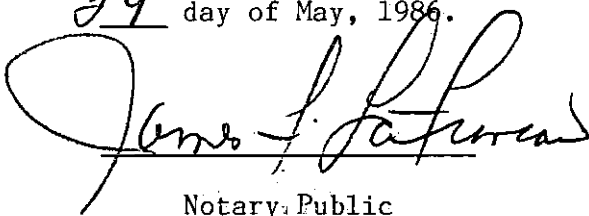


Paul M. Dubanowitz

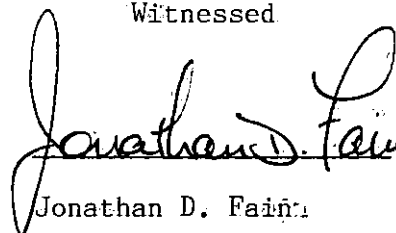
Plant Manager

Sworn before me this

29 day of May, 1986.


Notary Public

Witnessed


Jonathan D. Fair

Vice President, Teknor Apex Co.